

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

VICTOR OLDS  
1610 Olney-Sandy Spring Road  
Sandy Spring, Maryland 20860

PLAINTIFF

VS.

CIVIL NO. 1435E

THE TOWN OF BRUNSWICK  
BRUNSWICK, MARYLAND 21716

Serve: Richard Campbell, Mayor  
Town Office  
Brunswick, Maryland 21716

DEFENDANT

\* \* \* \* \*

COMPLAINT TO QUIET TITLE AND/OR ADVERSE POSSESSION

Now comes Victor Olds, Plaintiff, by Lawrence E. Finegan and Rosenstock, Burgee & Welty, P.A., his attorneys, and represent to this Court as follows:

1. Plaintiff is the owner of a certain parcel of land described as Lots 7 and 8 on a Plat of John L. Jordan, recorded in Liber JLJ 14, Folio 121, in the Land Records of Frederick County, Maryland, a copy of which is attached, marked Exhibit 1, and more fully described in the Deed of conveyance unto Plaintiff, dated September 1, 1978, and recorded in Liber 1061, folio 578, Land Records of Frederick County, Maryland, a copy of which is attached hereto, marked Exhibit 2.

2. Plaintiff has been advised of the existence of a title defect to the subject property, which is more fully described as follows:

Plaintiff's improvements at such location encroach onto property shown of record to be a portion of West B Street, Brunswick, Maryland, which is more fully shown on a Plat prepared by Harris Smariga & Associates, dated September 10, 1985, a copy of which is attached hereto, marked Exhibit 3. Such encroachment is shown as "Area Added